

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

**ORDER GRANTING THREE HUNDRED NINETIETH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO
NO LIABILITY CLAIMS**

Upon the *Three Hundred Ninetieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to No Liability Claims* [ECF No. 17973] (the “Three Hundred Ninetieth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated August 25, 2021, for entry of an order reducing the amount of certain claims filed against

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Ninetieth Omnibus Objection.

the Commonwealth on the basis that these claims (i) have been satisfied, in whole or in part, and/or (ii) assert, in whole or in part, liabilities for which the Commonwealth is not liable, as more fully set forth in the Three Hundred Ninetieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Ninetieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Ninetieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Three Hundred Ninetieth Omnibus Objection (collectively, the “No Liability Claims”) have been satisfied in whole or in part and/or assert, in whole or in part, liabilities for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Three Hundred Ninetieth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Ninetieth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Ninetieth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Ninetieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the No Liability Claims are hereby disallowed; and it is further

ORDERED that Kroll is authorized and directed to designate the No Liability Claims as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 17973 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Ninetieth Omnibus Objection

Three Hundred Ninetieth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	CAMERA MUNDI INC PO BOX 6840 CAGUAS, PR 00726-6840	5/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22733	\$ 8,840.70
	Reason: Per the books and records of the Commonwealth certified Invoices totaling \$8,840.70 were not received and therefore not due and owing per the Commonwealth agency asserted.					
2	COBAS, MARCO A. 184 VIA ENRAMADA URB ENTRERIOS TRUJILLO ALTO, PR 00976	2/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	534	\$ 1,012.50
	Reason: Per the books and records of the Commonwealth, a certified invoice was not received and therefore is not due and owing by the Commonwealth agency asserted.					
3	COMMUNICATION LEASING LEASING CORPORATION PO BOX 362526 SAN JUAN, PR 00936-2565	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28499	\$ 39,034.15
	Reason: Invoices totaling \$37,753.44 were paid via multiple Checks during the period starting 03/09/2017 to 02/07/2018. Remaining asserted liability pertains to an amount of \$1,280.71 withheld for taxes and therefore is not due and owing per the asserted Commonwealth agency.					
4	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	5/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23860	\$ 4,293.21
	Reason: Invoices totaling \$1,198.22 paid via EFT between 05/15/2017 and 6/015/2018; Per the books and records of the Commonwealth, invoices totaling \$3,094.99 were associated with amounts that were outside of the approved contract, where no contract was in place or where the invoices were never received and therefore are not due and owing by the Commonwealth agency asserted.					
5	DUEÑAS TRAILERS RENTAL, INC. PO BOX 194859 SAN JAUN, PR 00919	5/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	49729	\$ 3,348.00
	Reason: Invoice totaling \$1,116.00 was paid via EFT No. 00083613 on 06/13/2018. Per the books and records of the Commonwealth certified invoices totaling \$2,232.00 were not received and therefore are not due and owing by the asserted Commonwealth agency.					
6	JORGENSEN, ROY PO BOX 70 BUCHEYSTOWN, MD 21717	4/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	7648	\$ 22,873.50
	Reason: Amounts totaling \$2,983.00 relate to tax withheld by the Commonwealth agency asserted and is therefore not due and owing. Per the books and records of the Commonwealth, the remaining \$19,890.00 is related to certified invoices not received and therefore not recognized as due and owing by the Commonwealth agency.					
7	MCCANN ERICKSON CORPORATION, SA COLÓN SANTANA & ASOC. 315 COLL & TOSTE URB. BALDRICH SAN JUAN, PR 00918	6/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	53762	\$ 96,267.22*
	Reason: Invoices totaling \$51,163.25 were paid via multiple Checks/EFT's on 09/07/2018. Per the books and records of the Commonwealth, invoices totaling \$45,103.97 were not included as part of the approved contract.					

Three Hundred Ninetieth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
8	MCCANN ERICKSON CORPORATION,SA COLÓN SANTANA & ASOC. 315 COLL & TOSTE URB. BALDRICH SAN JUAN, PR 00918	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	59767	\$ 124,330.02
Reason: Invoices totaling \$39,386.08 were paid via multiple Checks/EFT's during the period of 07/02/2018 and 09/12/2018. Amounts totaling \$84,943.94 associated with invoices not associated with a valid contract and therefore are not recognized as due and owing by the Commonwealth agency asserted.						
9	NEGRON FERNANDEZ, JOSE R BUCARE 2105 TOPACIO GUAYNABO, PR 00969	4/2/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	4793	\$ 2,178.04
Reason: Per the books and records of the Commonwealth, the contract associated with these invoices was cancelled and therefore no amounts are due and owing on behalf of them.						
10	WALDEMAR D LOPEZ MATOS DBA LOPEZ TRUCK AND BUS PARTS HC 02 BOX 6745 HORMIGUEROS, PR 00660-9715	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27503	\$ 1,124.40
Reason: Invoices totaling \$1,124.40 paid via Check No. 00096147 on 09/18/2018.						
					TOTAL	\$ 303,301.74*